July 12 ,1995

Certified Mail No. Z 215 694 132

Office of the Secretary
Federal Communications Commission
Washington, DC   20554

Re: CC Docket No. 94-102
      RM-8143
      Revision of the Commission's rules
      to ensure compatibility with
      enhanced 911 emergency calling systems
      Additional Information That May Be of Value To You

Gentlemen:

We responded to the above docket on December 16, 1994.

Enclosed please find original plus nine copies of a prefinal, descriptive flier we are issuing to inquirers about a product we have scheduled for mass production in October of this year.

The flier provides additional information, concerning your request in the above matter for "comment on whether the proposed rules permit sufficient flexibility in conforming PBX systems to the needs of their owners while ensuring that the location of callers to 9-1-1 is properly identified to PSAP operators."

You may find it to be of value in your considerations.
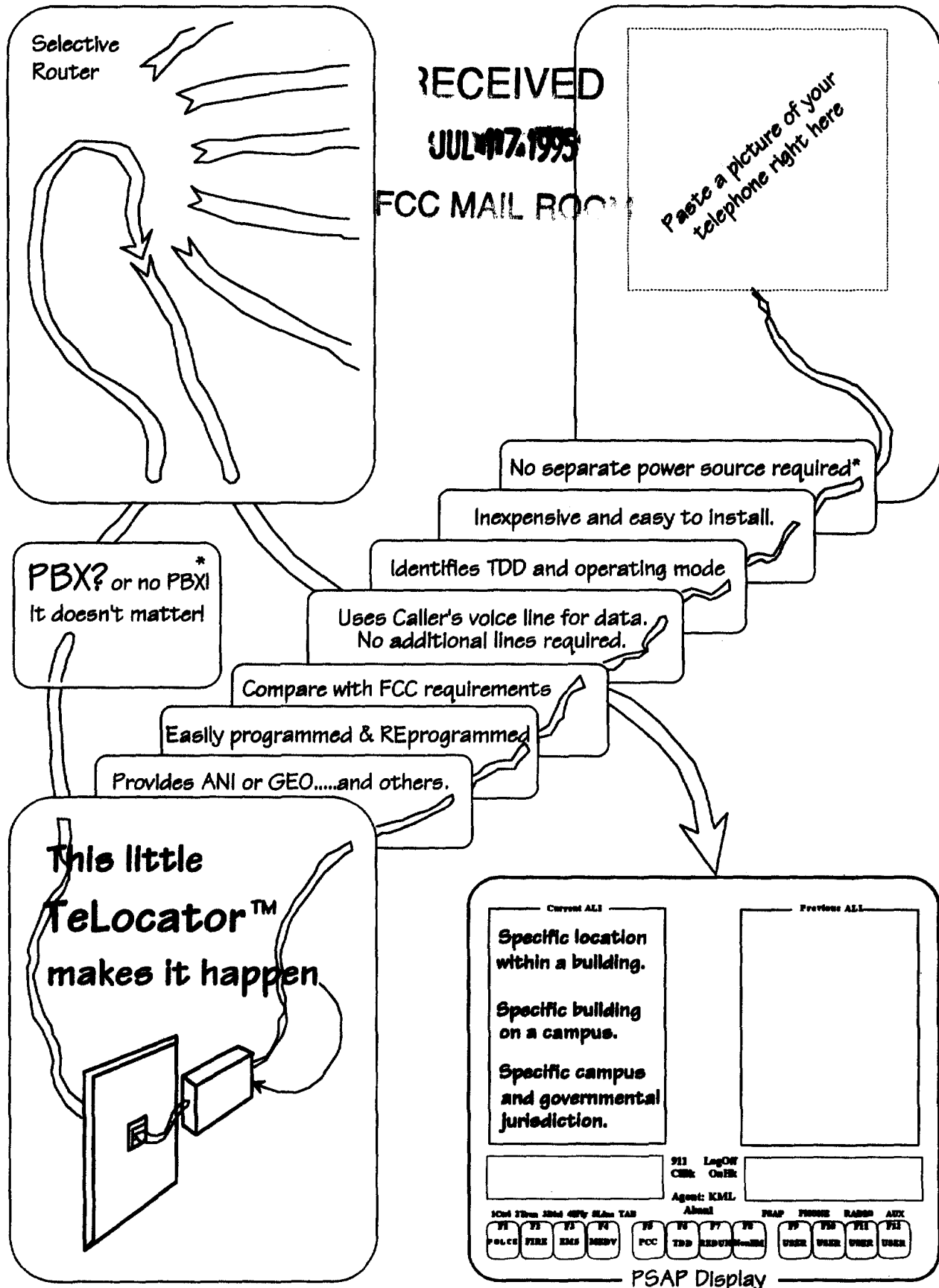
Respectfully,
KML Technology, Inc.

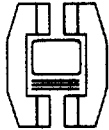Michael J. Ceglia
President.

File: 1071295a.sam

Solves the E9-1-1 PBX problem!

Selective
Router

RECEIVED

JUL 17 1995

FCC MAIL ROOM

Paste a picture of your telephone right here

No separate power source required*

Inexpensive and easy to install.

Identifies TDD and operating mode

PBX? or no PBX!
It doesn't matter!

Uses Caller's voice line for data.
No additional lines required.

Compare with FCC requirements

Easily programmed & REprogrammed

Provides ANI or GEO.....and others.

This little
TeLocator™
makes it happen

Current ALI		Previous ALI
Specific location within a building. Specific building on a campus. Specific campus and governmental jurisdiction.		

911   LogOff
Clk   OnHk

Agent: KML
About

PSAP Display

Locates any caller....anywhere!

* Tip/Ring telephones

KML Technology, Inc.
1460 Grandview Avenue, Unit 4
Mid Atlantic Corporate Center
West Deptford, NJ 08066
An alliance partner of Rockwell Telecommunications

Voice: 609-848-4200
Fax: 609-848-7080

TeLocator™
Auto Locates Any Caller & Auto IDs TDD/TTY

WHAT DOES IT DO?
TeLocator™ (U. S. Patent No. 5,339,351, foreign and other patents pending) is a small, easily programmable device that is part of a system for automatically identifying any E9-1-1 caller's location and type of equipment, regardless of the type of telephone system used to initiate the call*.

It is very important to note that this feat is accomplished using the same line over which the call is placed. No additional lines are necessary. While this fact represents a significant economic consideration, it also defines an integral, built in data link, guaranteeing data transmission capability that is independent of traffic on the public telephone network....particularly during intense, wide area catastrophes.   Note, too, that *TeLocator*™ does *not* require a separate source of operating power*.

HOW DOES IT DO IT?
As soon as a 9-1-1 call is received by the E9-1-1 selective router, the selective router places a DTMF query code on the line. A *TeLocator*™ device installed at the calling location determines what digits were first dialed when the caller picked up the telephone. If those digits were 9-1-1, the *TeLocator*™:

   ♦   detects the query code transmitted by the selective router;
   ♦   immediately mutes the line to prevent voice interference or caller discomfort; and,
   ♦   using the same voice line, transmits back to the selective router a burst of DTMF tones , describing the
        caller's location and the type of equipment used to place the call (such as TDD, etc.)...*allowing the call to
        be routed to the PSAP corresponding to the caller's actual location.*

If those digits were *not* 9-1-1, the *TeLocator*™ *will* provide an equipment description (TDD, etc.), but will *not* provide locational information in reponse to the query code.

WHAT ARE ITS PROGRAMMABLE FEATURES?
Query Code. May be programmed to recognize only the query code (up to 15 digits in length) that you specify.

Location Code. Any series of DTMF tones up to 31 digits in length may be programmed. Since they are merely digits, they may represent any type of location description. For example: ANI; ESN; latitude/longitude, telephone extension number; room number; etc.

Description of the Calling Equipment. A 2-digit code that describes the calling equipment. For example: '41' describes a "TDD device, operating in the TTY Mode"; '54' describes a "computer modem, operating @ 9600N81"; etc.

9-1-1 Dialing Detection. May be programmed to detect, or not to detect, the dialing of 9-1-1 (or any other combination of up to 15 digits) as the basis of its response to a query code*.

HOW WOULD I PROGRAM (OR REPROGRAM) A *TeLocator*™?
You'll need the *TeLocator*™ , the adaptor cable provided with the *TeLocator*™ , a 9V battery, and your (standard tip/ring) telephone. The battery snaps onto the adaptor cable, the adaptor cable plugs into the line jack on the *TeLocator*™, and the *TeLocator*™ cable plugs into the line jack on your telephone.

After that, you program all features and codes by simply dialing them into your telephone as instructed. The *TeLocator*™ will also play back any programmed feature for your review upon command.

THIS DEVICE HAS NOT YET BEEN TESTED FOR COMPLIANCE WITH FCC 47 CFR, PART 15.

* Tip/ring telephones. Some non-tip/ring telephones may require a separate power source.
  Some non-tip/ring telephones may not allow detection of the number dialed by the caller.